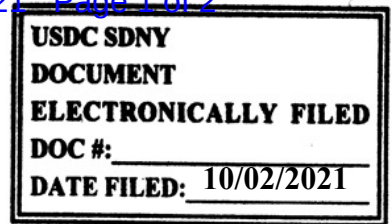


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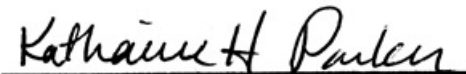


October 1, 2021

VIA ECF

Hon. Katherine H. Parker, U.S.M.J.
Daniel Patrick Moynihan, United States Courthouse
500 Pearl St.
New York, NY 10007-1312

APPLICATION GRANTED


Hon. Katharine H. Parker, U.S.M.J.

10/02/2021

Re: In re Lifetrade Litigation, No. 17-cv-02987-JPO-KHP

Dear Judge Parker:

We write on behalf of the Wells Fargo Defendants, Defendants S&P Global Inc. ("S&P"), and Robert A. Ruppenthal as Administrator of the Estate of Roy G. Smith ("Smith's Estate") (collectively "Defendants"). Pursuant to Paragraph III(d) of Your Honor's Individual Rules and Paragraph 10 of the Protective Order in this action (Dkt. 223), we respectfully seek leave to file under seal certain materials in connection with Defendants' letter to the Court regarding Plaintiffs' document production (the "Letter"), which is being contemporaneously filed.

The materials that we seek to file under seal include (i) a document produced by Plaintiffs in this action, which Plaintiffs designated as "Confidential" pursuant to the terms of the Protective Order; and (ii) an unofficial English translation of that document. Defendants met and conferred with Plaintiffs, and Plaintiffs did not withdraw their confidentiality designation.

Respectfully submitted,

/s/ Kelly A. Carrero

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Fargo Trust Company, N.A.), Wells Fargo
Delaware Trust Company, N.A., and ATC Realty
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/s/ Tammy L. Roy

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October 1, 2021

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